

US EPA ARCHIVE DOCUMENT

PERMITTEE:

Olin Corporation
Post Office Box 222
St. Marks, Florida 32355

I.D. Number: FL047096524
Permit/Cert Number: H065-199441
Date of Issue:
Expiration Date: October 1, 2001

County: Wakulla
Lat/Long: 30°10'04"N/84°13'12" W
Project: Operation and Construction of a
Hazardous Waste Miscellaneous
Unit.

This Permit is issued under the provisions of Chapter 403-722, Florida Statutes, and Florida Administrative Code Rule(s) 62-4, 62-530, 62-550 and 62-730. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To construct and operate a hazardous waste miscellaneous unit on Olin Corporation's property. The operation will consist of open burning and open detonation of waste explosives.

The construction will consist of improving the Open Burn Unit (OBU) surface by the installation of fill material, a liner and a concrete pad with a liquid collection sump. Three steel burning pans will be placed on the concrete pad and connected to a propane delivery piping system which will facilitate start up of the burn events. The burn pans will provide containment of waste materials and resulting burn residues. A "popping kettle" will also be placed on the pad and for use when explosive devices are treated.

The reactive waste (D003) generated in the manufacturing process is collected in 20 gallon drums and transported to the burn area where the drums are placed in the burn pans for disposal. Waste explosive material is placed in the "popping kettle" for ignition. The spent brass casings from this operation are recycled.

Operation of the facility will be in accordance with the permit application dated July 1, 1991, the revised permit application dated September 1993, and the revisions up to and including the April 5, 1996 submittal.

GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this Permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants, or representatives.
2. This Permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or

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conditions of this Permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this Permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This Permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the Permit.
4. This Permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This Permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this Permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this Permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the Permit and when required by Department rules.
7. The permittee, by accepting this Permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of the Permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this Permit; and
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this Permit or Department rules.

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Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this Permit, the permittee shall immediately notify and provide the Department with the following information:

- a. A description of and cause of non-compliance; and
- b. the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this Permit.

9. In accepting this Permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This Permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This Permit is required to be kept at the work site of the permitted activity during the entire period of construction, operation, or closure.

13. This Permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards
(Section 401, PQL 92-500)

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() Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.

b. The permittee shall retain at the facility or other location designated by this Permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this Permit, and records of all data used to complete the application for this Permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall, within a reasonable period of time furnish any information required by law which is needed to determine compliance with the Permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the Permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

16. In the case of a hazardous waste facility Permit, the following Permit conditions shall also apply.

a. The permittee will submit the following reports to the Department:

(1) Manifest discrepancy report: If a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy. If not resolved within 15 days after receiving the waste, the permittee shall immediately submit a letter report, including a copy of the manifest, to the Department.

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(2) Unmanifested waste report: Permittee shall submit an unmanifested waste report to the Department within 15 days of receipt of unmanifested waste.

(3) Biennial report: A biennial report covering facility activities during the previous calendar year must be submitted to the Department by March 1 of each even numbered year in accordance with Florida Administrative Code Chapter Rule 62-730.

b. Notification of any non-compliance which may endanger health or the environment, including the release of any hazardous waste that may endanger public drinking water supplies, or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility, shall be verbally submitted to the Department within 24 hours and a written submission provided within 5 days. The verbal submission within 24 hours shall contain the name, address, I.D. number and telephone number of the facility and owner or operator, the name and quantity of materials involved, the extent of injuries (if any), an assessment of actual or potential hazards, and the estimated quantity and disposition of recovered material. The written submission shall contain the following:

(1) A description of and cause of non-compliance; and

(2) If not corrected, the anticipated time the noncompliance is expected to continue and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

c. Reports of compliance or non-compliance with, or any progress reports on, requirements contained in any compliance schedule of this Permit shall be submitted no later than 14 days following each schedule date.

d. All reports or information required to be submitted to the Department by a hazardous waste permittee shall be signed by a person authorized to sign a Permit application.

SPECIFIC CONDITIONS

PART I - General Operating Requirements

1. The permittee shall maintain the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, in accordance with 40 CFR 264.31 and 40 CFR 264.601.
2. Prior to treatment of hazardous waste(s) other than those listed in Specific Condition 1, Part III of the permit, the permittee shall comply with the

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notification or permit modification requirements in paragraph a or b below. The permittee shall not treat a new waste stream until the Permit has been modified by the Department or written authorization is granted by the Department. [40 CFR 264.13].

a. For any new waste stream which is identical in constituents and concentrations as those in Specific Condition 1, Part III of the permit and which varies only by trade name, a permit modification will not be required. However, the permittee shall notify the Department in writing of the composition information of the identical permitted waste stream and the new waste stream prior to treating them.

b. For any new waste stream which contains identical constituents as those in Specific Condition 1, Part III of the permit and varies by ten percent or less in concentrations of those constituents, the permittee shall submit to the Department a request for a minor permit modification. The request must include the composition information for both the new and the permitted waste stream.

c. For any new waste stream which contains constituents which are different from those listed in Specific Condition 1, Part III of the permit or any new waste stream which varies in concentration by more than ten percent from those listed in Specific Condition 1, Part III of the permit, the permittee shall submit to the Department a request for a major permit modification. This request shall contain a complete waste analysis which includes descriptions of the waste in its original composition and the thermal decomposition products of the proposed new waste stream. This analysis must be incorporated in the general waste analysis plan and retained on site.

3. The permittee shall follow the procedures described in the waste analysis plan, Attachment II.A.6 of the permit application. [40 CFR 264.13(b)].
4. The permittee shall comply with the security provisions of 40 CFR 264.14(b)(2) and (c).
5. The permittee shall inspect the facility operating, emergency, and safety equipment in accordance with the schedule approved in Table II A.4(b)-2, Attachment II.A.4(b) and Table II.I.1-1 Attachment II.I.1 of the permit application. (Attachments 1 & 2) The permittee shall remedy any deterioration or malfunction discovered by an inspection, in accordance with the requirements of 40 CFR 264.15(c). Changes, additions, or deletions to the schedule must be approved in writing by the Department. The schedule must be maintained as part of the operating record of the facility. [40 CFR 264.15]
6. Facility personnel must successfully complete the approved training program indicated in Attachment II.A.4(e) of the permit application within six months of employment or assignment to a facility or to a new position at the facility. Verification of this training must be kept with the personnel

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training records and maintained on site. Personnel shall not work unsupervised until training has been completed. The training must be reviewed by facility personnel at least once annually. Facility shall maintain an updated list of personnel handling hazardous waste and their respective job titles at the site.

7. The permittee shall comply with the general requirements of 40 CFR 264.17(a) and (b), and the location requirements of 40 CFR 264.176.
8. The permittee shall comply with the following conditions concerning preparedness and prevention:
 - a. At a minimum, the permittee shall equip the facility with the equipment described in the Contingency Plan, Table II.A.4(b)-20 of the permit application, as required by 40 CFR 264.32.
 - b. The permittee shall test and maintain the equipment specified in Specific Condition 8(a), of this part, as necessary to assure its proper operation in time of emergency, as required by 40 CFR 264.33.
 - c. The permittee shall maintain access to the communications or alarm system, as required by 40 CFR 264.34.
 - d. The permittee shall maintain arrangements with state and local authorities as required by 40 CFR 264.37. If state or local officials refuse to enter into preparedness and prevention arrangements with the permittee, the permittee must document this refusal in the operating record.
9. The permittee shall comply with the following conditions concerning the contingency plan:
 - a. The permittee shall immediately carry out the provisions of the Contingency Plan, Attachment II.A.4(b) of the permit application, and follow the emergency procedures described by 40 CFR 264.56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threaten human health or the environment. The permittee shall give proper notification if an emergency situation arises and within fifteen (15) days must submit to the Department a written report which includes all information required in 40 CFR 264.56(j).
 - b. The permittee shall comply with the requirements of 40 CFR 264.53.
 - c. Within seven (7) days of meeting any criteria listed in 40 CFR 264.54(a), (b), or (c), the permittee shall amend the plan and submit the amended plan for Department approval. Any other changes to the plan must be submitted to the Department within seven (7) days of the

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change. All amended plans must be distributed to the appropriate agencies.

d. The permittee shall comply with requirements of 40 CFR 264.55, concerning the emergency coordinator.

e. The Department of Environmental Protection's 24-hour emergency telephone number is (904)413-9911. During normal business hours, the Department's Northwest District Office may be contacted at (904)444-8360.

10. The permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76.
11. The permittee shall maintain a written operating record at the facility which includes:
 - a. the description and quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the Open Burn Unit (OBU), as specified in 40 CFR 264.73(b)(1).
 - b. the location of hazardous materials and hazardous waste within the facility, Table II.A.4(b)-1, and the quantity at the OBU;
 - c. the results of waste analyses;
 - d. a summary report and details of incidents that require implementation of the contingency plan;
 - e. manifest numbers;
 - f. Land Disposal Restriction documents as specified in 40 CFR 264.73(b)(12);
 - g. the results of inspections (for 3 years);
 - h. annual certification of waste minimization;
 - i. the closure plan and cost estimates;
 - j. biennial reports;
 - k. air, and groundwater monitoring data;
 - l. records and results of waste analyses performed; and
 - m. weather conditions to include humidity, weather forecast, wind speed and wind direction at each event.

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These records must be maintained at the facility until completion of closure and the certification of closure is accepted by the Department. [40 CFR 264.73]

12. The permittee must comply with 40 CFR Part 264.73(b)(9), and the permittee must certify, no less often than annually, that:
 - a. The permittee has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the permittee to be economically practicable;
 - b. The proposed method of treatment, storage or disposal is the most practicable method available to the permittee which minimizes the present and future threat to human health and the environment; and,
 - c. The permittee shall maintain copies of certification in the facility operating record as required by 40 CFR 264.73(b)(9).
13. If the waste minimization program, as detailed in Specific Conditions 12 a. and 12 b. of this part, is applicable, then the permittee shall, at a minimum, address the following elements:
 - a. Top management support-
 1. A dated and signed policy describing management support for waste minimization and for implementation of a waste minimization plan,
 2. A description of employee awareness and training programs designed to involve employees in waste minimization planning and implementation to maximize the extent feasible, and
 3. A description of how a waste minimization plan has been incorporated into management practices so as to ensure ongoing efforts with respect to product design, capital planning, production operations, and maintenance;
 - b. Characterization of waste generation-

Identification of types, amounts, and hazardous constituents of waste streams, with the source and date of generation;
 - c. Periodic waste minimization assessments-
 1. Identification of all points in a process where materials can be prevented from becoming a waste, or can be recycled,
 2. Identification of potential waste reduction and recycling techniques applicable to each waste, with a cost estimate for capital investment and implementation,

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3. Description of technically and economically practical waste reduction/recycling options to be implemented, and a planned schedule for implementation,

4. Specific performance goals, preferably quantitative, for the source reduction of waste by stream. Whenever possible, goals should be stated as weight of waste generated per standard unit of production, as defined by the generator.

d. Cost allocation system-

1. Identification of waste management costs for each waste, factoring in liability, transportation, recordkeeping, personnel, pollution control, treatment, disposal, compliance, and oversight costs to the extent feasible,

2. Description of how departments are held accountable for the wastes they generate,

3. Comparison of waste management costs with costs of potential reduction and recycling techniques applicable to each waste;

e. Technology transfer-

Description of efforts to seek and exchange technical information on waste minimization from other parts of the company, other firms, trade associations, technical assistance programs, and professional consultants;

f. Program evaluation-

1. Description of types and amounts of hazardous waste reduced or recycled,

2. Analysis and quantification of progress made relative to each performance goal established and each reduction technique to be implemented,

3. Amendments to waste minimization plan and explanation,

4. Explanation and documentation of reduction efforts completed or in progress before development of the waste minimization plan, and

5. Explanation and documentation regarding impediments to hazardous waste reduction specific to the individual facility.

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14. 40 CFR Part 268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances in which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage, or disposal unit. The permittee shall maintain compliance with the requirements of 40 CFR Part 268. If the permittee has applied for an extension, waiver, or variance under 40 CFR Part 268, the permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final approval of such application.
15. A restricted waste identified in 40 CFR Part 268 Subpart C may not be placed in a land disposal unit without further treatment unless the requirements of 40 CFR Part 268 Subparts C and/or D are met.
16. The storage of hazardous wastes restricted from land disposal under 40 CFR Part 268 is prohibited unless the requirements of 40 CFR Part 268 Subpart E are met.

PART II Construction Requirements For Open Burn Unit

1. The permittee shall upgrade the Open Burn Unit (OBU) as follows:
 - a. The existing Open Burn Unit (OBU) shall be regraded. The existing side slopes leading to the surrounding moat shall be smoothed and regraded to a 1 vertical to 2 horizontal slope. Drawing: D-12.7-0-012.
 - b. A three inch layer of clean sand shall be placed on the regraded surface followed by a 6 inch layer of clayey soil. This soil will act as a bedding layer for a 40-mil prefabricated PVC liner which shall be installed over the entire area of the unit.
 - c. A 8 oz. non-woven heavy gauge geo-textile fabric shall be placed on the PVC liner for protection and to provide limited lateral drainage.
 - d. A six inch limerock material meeting the Florida Department of Transportation's specification for a stabilized base shall be placed and lightly compacted over the entire area.
 - e. A concrete revetment shall be constructed on the sides of the OBU for stabilization and protection against slope washout in an extreme flood event.
2. The permittee shall upgrade the burn control system as follows:
 - a. A six inch reinforced concrete (28 day compressive strength 3,000 pounds per square inch) containment pad 70 feet by 33 feet shall be constructed in the center of the Open Burn Unit (OBU) as shown in Figure II.I.1-3, Attachment II.I.1 of the permit application (Attachment 3 and Drawing D-12.7-1-023). The concrete slab shall have a 12 inch curb and sloped to a sump and be dimensioned to serve as secondary containment for

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the actual steel burning structures--the burning pans (for waste powders and propellants) and the popping kettle (for spent devices). The sump shall piped and drain to the Olin's Industrial Waste Treatment Plant.

b. Three burn pans shall be constructed and placed on the concrete pad described in paragraph 2a. above. The burn pans shall meet the specifications shown in Subattachment II.I.1-1 and Drawings D-12.7-1-021, S-484-159, S-484-162 and S-484-165 in the permit application. The pans shall be connected to a propane delivery piping system to facilitate start-up of burn events.

c. A popping kettle as shown on drawing S-484-144 shall be placed on the concrete pad and used when detonation of explosive devices is required.

PART III - Thermal Treatment Unit

1. The permittee is allowed to thermally treat, in the burn pans and popping kettle, only the following hazardous wastes, as described in Attachment II.A.5 and listed in Table II.A.6-1, of the Permit application:
 - a. Group 1, Propellants. This group includes BALL POWDER™ and materials mixed with the BALL POWDER™. The primary constituents of this group are nitrocellulose, nitroglycerin, nitramines, and nitroguanidine.
 - b. Group 2, Devices. These materials consist of spent shellcases, primers, and similar items. These are spent shell casings and under no circumstances will any lead or lead core bullets be allowed to be treated.
 - c. Group 3, High Explosives. Waste liquid high explosive such as nitroglycerine shall be absorbed onto wood flour to reduce the sensitivity prior to treatment.
2. The permittee shall not thermally treat more than 1,160 pounds of hazardous waste on any single day.
3. The permittee shall not exceed a batch size of 810 pounds in any one of the burn pans.
4. The permittee shall comply with the waste compatibility requirements of 40 CFR 264.17(b).
5. The permittee is prohibited from:
 - a. treating at the OBU waste streams or waste solvents not identified and described in Condition 1 of this part.
 - b. treating inert (i.e., nonhazardous) waste at the OBU.

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6. The permittee shall comply with the following requirements prior to each thermal treatment event:

a. The permittee shall conduct inspections of the OBU, on each day of the thermal treatment and weekly when the unit is not in operation. The "Burning Grounds Safety Checklist at Attachment 2 shall be completed during each inspection.

b. Residue from a previous event shall be removed and placed in 55 gallon drums for off-site disposal. In the event that unburned reactive/combustible material is found; it must be re-treated.

c. A waste analysis in accordance with Attachment II.A.6 of the permit application shall be performed on the drummed waste prior to disposal.

d. Waste may be placed in the burn pans or popping kettle only when a thermal treatment event is planned within the next 4 hours.

e. Thermal treatment may only be accomplished under the following conditions:

- (1) Daylights hours;
- (2) Wind speeds less than or equal to 15 mph;
 - (3) No electrical storms within 3 miles of the thermal treatment unit;
 - (4) No forecast of a major storm where local flooding may impact the Open Burn Unit; and
- (5) No inversion forecast.

f. All the hazardous waste destined for thermal treatment shall be collected, transported, placed in the burn pans or popping kettle and treated in accordance with the work instructions listed in Subattachment II.I.1-1 of the permit application.

g. On the day of each scheduled thermal treatment event and prior to transporting the waste to the thermal treatment area, the permittee shall:

- (1) verify and record the meteorological conditions listed in condition 6e, above;
- (2) inspect the concrete foundation and curbs surrounding the burn pans and popping kettle for cracks and excess debris;
- (3) insure that the remote power switch at the control panel in the shed located outside the thermal treatment area is in the "off" position;
- (4) inspect the propane delivery system for deterioration, and insure that the valve leading from the tank to the burn pans and popping kettle is closed.

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7. Transportation to include the loading and unloading of the hazardous waste to be disposed of by thermal treatment shall be accomplished in accordance with Subattachment II.I.1-1 of the permit application.
8. Operation to include loading and ignition of the propane assisted treatment in the burn pans shall be accomplished in accordance with Subattachment II.I.1-1 of the permit application.
9. Operation to include loading and ignition of the propane assisted popping kettle shall be accomplished in accordance with Subattachment II.I.1-1 of the permit application.
10. Thermal treatment of hazardous waste shall only be conducted by qualified personnel, experienced in handling such reactive waste. Training requirements are listed in Attachment II.A.4(e) of the permit application.
11. The permittee shall implement appropriate remedial actions for the problems discovered during the inspections conducted pursuant to Specific Condition 6a. of this part. For problems that cannot be remediated within 48 hours, the permittee shall notify the Department within 3 working days and follow up with a written report within 14 days of discovering such problems. The report must include descriptions of the remedial actions taken. The permittee shall cease operation of the Open Burn Unit until completion of the necessary repairs.
12. The permittee shall maintain compliance with the environmental performance standards listed in 40 CFR 264.601 at all times.

PART IV - Surface Water Monitoring

1. Four sampling locations will be sampled quarterly for surface water sampling. Three of the sampling locations will be OSW-1, OSW-2 and OSW-3 as shown in Attachment 6. The background sampling location shall be in the moat upgradient of OSBG-1 as shown in Attachment 6.
2. The permittee shall perform quarterly surface water sampling, in accordance with Rule 62-302.530, F.A.C., for the above sampling locations in March, June, September, and December of each year, pursuant to the approved QAPP. The Permittee shall collect one sample from each location as specified in Specific Condition 1 of this Part during the months specified. The permittee shall submit to the Department surface water monitoring reports that include information pursuant to Specific Conditions 3 and 4 of this Part. The surface water monitoring data from the March sampling event shall be submitted no later than the last day of May; the surface water monitoring data from the June sampling event shall be submitted no later than the last day of August; the surface water monitoring data from the September sampling event shall be submitted no later than the last day of November; and the surface water monitoring data from the December sampling event shall be submitted by no later than the last day of February. If, for any reason,

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the permittee is unable to submit analytical reports within the specified time, the permittee must comply with General Condition 8.

3. The permittee shall sample all sampling locations as specified in Specific Conditions 1 of this part during each sampling event for the following field indicator parameters: pH, temperature, specific conductivity, and turbidity.
4. During each quarterly surface water sampling event, (see Specific Condition 2 of this Part), the Permittee shall sample all sampling locations, as specified in Specific Condition 1 of this Part, for all constituents as listed below:

CONSTITUENT	MCL's (ug/l)
Barium	2,000.0
Benzene	71.28 (annual average)
Chromium	100.0
Diphenylamine	Background*
Ethylbenzene	30.0
Fluoride	10,000.0
Lead	15.0
Methylene chloride	1580.0
N-Nitrosodiphenylamine	Background*
Nitrocellulose	Background*
Nitrate	See Ω footnote below
Nitrite	See Ω footnote below
Nitroglycerin	Background*
Sulfate	250,000.0
Toluene	40.0
Vanadium	Background*
Xylenes (total)	20.0
Zinc	$e(0.8473 [\ln H] + 0.7614)$ ◆
4-Amino-2,6-dinitrotoluene (4-Am-DNT)	Background
2-Amino-4,6-dinitrotoluene (2-Am-DNT)	*Background
1,3-Dinitrobenzene (1,3-DNB)	*Background
2,4-Dinitrotoluene (2,4-DNT)	9.10 Δ
2,6-Dinitrotoluene (2,6-DNT)	*Background

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Hexahydro-1,3,5-trinitro-1,3,5-triazine (RDX)	*Background
Methyl-2,4,6-trinitrophenylnitramine (Tetryl)	*Background
Nitrobenzene (NB)	*Background
2-Nitrotoluene (2-NT)	*Background
3-Nitrotoluene (3-NT)	*Background
4-Nitrotoluene (4-NT)	*Background
Octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine (HMX)	*Background
1,3,5-Trinitrobenzene (1,3,5-TNB)	*Background
2,4,6-Trinitrotoluene (2,4,6-TNT)	*Background

Note:** In accordance with Rule 62-302.200(3), F.A.C., background is defined as the condition of waters in the absence of the activity or discharge under consideration, based on the best scientific information available to the Department.

Δ = Annual Average = the maximum concentration at average annual flow conditions
= Criteria are protective of human health, not of aquatic life

*** = above natural background conditions

◆ = lnH means the natural logarithm of total hardness expressed as mg/L of CaCO₃. For metals criteria involving equations with hardness, the hardness shall be set at 25 mg/L if actual hardness is <25 mg/L and set at 400 mg/L if actual hardness is >400 mg/L

Ω = In accordance with Rule 62-302.530, F.A.C., in no case shall nutrient concentrations of a body of water be altered so as to cause an imbalance in natural populations of aquatic flora or fauna.

5. If it is determined, by the permittee, at any time that the maximum concentration limit for any surface water constituent (Specific Condition 4 of this Part) has been exceeded, the operations for the Open Burn Unit shall immediately be ceased, except as specified by Specific Condition 6 of this Part. The permittee shall then determine the reason for the exceedences and submit a report including these reasons as well as a contingency plan describing preventative measures to be taken in the future to prevent further contamination and pollution. Also, the sampling location shall be resampled. If an exceedence occurs during resampling, then the exceedence shall be a violation of the permit and a violation of Florida Statute 403.161(1)(a).
6. If it is determined, by the permittee, at any time that the maximum concentration limit for any surface water constituent (Specific Condition 4 of this Part) has been exceeded, the permittee may demonstrate that a source

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other than the regulated unit caused the exceedence of the maximum concentration limit, or that the exceedence is an artifact caused by an error in sampling, analysis or natural variation in the surface water.

7. All surface water sampling and analysis shall be conducted in accordance with QAPP #960122, dated March 29, 1996. The permittee shall revise the QAPP in accordance with Rule 62-160.220, F.A.C., whenever there is a change in sampling and/or analytical procedures, including personnel or laboratory. The revised plan or revisions must be submitted to the Department for approval within thirty (30) days of such changes, and be accompanied by the appropriate permit modification fee.

PART V Groundwater Monitoring

1. The Waste Management Area [40 CFR 264.95(b)] shall be designated by an imaginary line circumscribing the open burn unit, as indicated in Attachment 4 of this permit.
2. The Point of Compliance (POC) [40 CFR 264.95(a)] shall be the southwest, southeast and northwest edges of the Open Burn Unit, as shown on Attachment 5 of this permit.
3. The POC wells shall be OLI-1, OLI-2 and OLI-3. The background well shall be MW-2. If future groundwater elevation monitoring indicates a change in groundwater flow direction, this Permit may be modified to require the installation of additional monitoring wells and revisions to the groundwater monitoring plan.
4. Within 15 calendar days of installation of any new monitoring well(s), the permittee shall submit the following information:
 - a. A Well Construction Summary Report [Form 62-730.900(2)(b)];
 - b. A location map of all new and existing wells with correct orientation and scale;
 - c. A description of protective devices for each well;
 - d. A description of well development procedures and duration of well development;
 - e. A description of the containerization, characterization and disposal of cuttings, drilling muds and fluids, and purge water; and,
 - f. Detailed lithologic logs, including the description of soils and the classification used, the geologist or geotechnical person responsible for compiling the lithologic logs, the sampling devices, and the sampling intervals.

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5. Upon Permit issuance, the facility shall be in Detection Monitoring in accordance with 40 CFR 264.98.
6. The permittee shall perform quarterly sampling for monitoring wells OLI-1, OLI-2, OLI-3, and MW-2, in March, June, September, and December of each year, pursuant to 40 CFR 264.98(d). During each sampling event, four replicate samples shall be taken from each of the above monitoring wells, depending on site conditions.
7. The permittee shall sample the above monitoring wells quarterly as specified in Specific Condition 6 of this Part, for as long as the Open Burn Unit is in operation, for all constituents listed in Specific Condition 13 of this Part. However, if after groundwater samples have been collected for a minimum of one year, and there have been no exceedences of the maximum groundwater concentrations or MCLs as specified in Specific Condition 13 of this Part, to a statistically significant degree in any POC well, the permittee shall continue the groundwater monitoring program thereafter on a semiannual basis, during the months of March and September for the life of this permit for the open burn unit (waste management unit area), so long as the detection monitoring program remains in effect.
8. The permittee shall sample all wells specified in Specific Conditions 6 of this part during each sampling event for the following field indicator parameters: pH, temperature, specific conductivity, and turbidity.
9. The permittee shall submit to the Department groundwater monitoring reports that include information pursuant to Specific Conditions 5, 6, 7, 8, 12, 13, 14, 15 and 18 of this Part. The groundwater monitoring data from the March sampling event shall be submitted no later than the last day of May; the groundwater monitoring data from the June sampling event shall be submitted no later than the last day of August; the groundwater monitoring data from the September sampling event shall be submitted no later than the last day of November; and the groundwater monitoring data from the December monitoring event shall be submitted by no later than the last day of February. If, for any reason, the permittee is unable to submit analytical reports within the specified time, the permittee must comply with General Condition 8.
10. If it is determined, by the permittee, at any time that the maximum concentration limit for any groundwater constituent (Specific Condition 13 of this Part) has been exceeded by a statistically significant amount, the permittee may demonstrate that a source other than the regulated unit caused the exceedence of the maximum concentration limit, or that the exceedence is an artifact caused by an error in sampling, analysis or statistical evaluation or natural variation in the groundwater. In making a demonstration under this paragraph, the permittee must comply with the specifications in 40 CFR Part 264.98(g)(6).
11. If the reports submitted in accordance with Specific Condition 9 of this Part indicate that hazardous wastes or hazardous constituents have entered

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the groundwater from the regulated unit, the permittee shall submit a permit modification to comply with 40 CFR Part 264.98(g)(4) within 90 days. The permit modification shall include a corrective action program in accordance with 40 CFR Part 264.100 along with a proposed monitoring program which must be as effective as that program in determining compliance with the ground-water protection standard and the compliance monitoring program in accordance with 264.99 and 264.100(d). The permittee shall also comply with Rules 62-4.050(7) and 62-730.290(4), F.A.C.

12. The permittee shall measure groundwater elevations of the following monitoring wells; OLI-1, OLI-2, OLI-3 and MW-2 (see Attachment 5) prior to each sampling event to comply with 40 CFR Part 264.97(f). All groundwater elevations for each sampling event must be measured within an eight (8) hour period. These data must be submitted to the Department with each monitoring report. In addition, total depths of all wells utilized for groundwater monitoring must be determined by physical measurement in March of each year to determine whether siltation of any well exists, and to calculate the casing volume to be purged prior to sampling. If infilling or siltation of wells is determined, the discovery and any corrective action taken shall be reported to the Department within 15 days.
13. The permittee shall quarterly sample all wells as specified in Specific Condition 6 of this Part for the following constituents during each sampling event:

CONSTITUENT	MCL's (ug/l)
Barium	2000
Benzene	1
Chromium	100
Diphenylamine	175
N-Nitrosodiphenylamine	7
Ethylbenzene	30
Fluoride	2000
Lead	15
Methylene chloride	5
Nitrate	10000
Nitrite	1000
Nitrocellulose	*Background
Sulfate	250000
Toluene	40
Vanadium	49
Xylenes (total)	20
Zinc	5000
4-Amino-2,6-dinitrotoluene (4-Am-DNT)	*Background

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2-Amino-4,6-dinitrotoluene (2-Am-DNT)	*Background
1,3-Dinitrobenzene (1,3-DNB)	50
2,4-Dinitrotoluene (2,4-DNT)	0.2
2,6-Dinitrotoluene (2,6-DNT)	0.1
Hexahydro-1,3,5-trinitro-1,3,5-triazine (RDX)	10
Methyl-2,4,6-trinitrophenylnitramine (Tetryl)	*Background
Nitrobenzene (NB)	9.5
2-Nitrotoluene (2-NT)	*Background
3-Nitrotoluene (3-NT)	*Background
4-Nitrotoluene (4-NT)	*Background
Octahydro-1,3,5,7-tetranitro-1,3,5,7-tetrazocine (HMX)	*Background
1,3,5-Trinitrobenzene (1,3,5-TNB)	60
2,4,6-Trinitrotoluene (2,4,6-TNT)	10

Note * = Practical Quantitation Limit (PQL) or Background, whichever is greater

14. The permittee must determine if any groundwater maximum concentration limits (MCLs) are exceeded to a statistically significant degree for any hazardous constituent listed in Specific Condition 13 of this Part at any Point of Compliance (POC) well specified in Specific Condition 6 of this Part. This determination shall be performed after the conclusion of each sampling event as specified in Specific Condition 6 of this Part, by using the analysis of variance (ANOVA) method based on ranks followed by multiple comparisons procedures. This method must include estimation and testing of contrasts between each compliance well's mean and the background mean levels for each constituent, as described in the EPA guidance manual "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities", dated April 1989.
15. The permittee shall provide the Department with opportunities to observe groundwater sampling and split samples by providing notification at least ten (10) days prior to each sampling event.
16. The permittee shall, at a minimum, inspect the integrity of the groundwater monitoring wells during each groundwater monitoring event and notify the Department in writing of any damage requiring repair (not maintenance) to the groundwater monitor wells and provide a schedule for repair within seven calendar days. A description of corrective action taken shall be submitted in writing to the Department, in any case, within seven days of completion date.
17. If wells are to be abandoned, they shall be abandoned in accordance with Rule 62-532.500(4), F.A.C.

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18. The permittee shall determine the groundwater flow rate and direction in the uppermost aquifer quarterly and include this determination as well as potentiometric surface water maps in the quarterly groundwater monitoring reports as required by Specific Condition 9 of this Part.
19. All groundwater analyses must be conducted on unfiltered samples. [Rule 62-730.220(5)(h)(2), F.A.C.]
20. All purgewater, decontamination water, well cuttings, drilling fluids, and well development water, shall be containerized, characterized, and disposed of in accordance with the applicable requirements of 40 CFR Part 262.10, 40 CFR Part 262.11 and the site specific QAPP #960122, dated March 29, 1996.
21. All groundwater sampling and analysis shall be conducted in accordance with the site specific QAPP #960122, dated March 29, 1996. The permittee shall revise the QAPP in accordance with Rule 62-160.220, F.A.C., whenever there is a change in sampling and/or analytical procedures, including personnel or laboratory. The revised plan or revisions must be submitted to the Department for approval within thirty (30) days of such changes, and be accompanied by the appropriate permit modification fee.
22. For each monitoring event, the background concentration for each monitoring parameter specified in Specific Condition 13A of this Part shall be determined based on analytical results obtained from background monitoring well MW-2 in accordance with the schedule specified in Specific Condition 6 of this Part. The average constituent concentration of the four replicate samples obtained from MW-2 shall be considered the background concentration for each constituent for that monitoring event. The maximum concentration limit for each of the listed constituents shall be the respective background concentration limit established by this Specific Condition or the regulatory MCL listed in this condition, whichever is greater. The PQL is the minimum concentration of a chemical that can be measured and reported in accordance with the Quality Assurance Project Plan as described in Specific Condition 21 of this Part.
23. The permittee shall comply with the general groundwater monitoring requirements of 40 CFR Part 264.97.
24. A professional survey for monitoring wells OLI-1, OLI-2 and OLI-3 must be performed within 45 days of issuance of this permit.

Part VI Closure

1. The permittee shall close the facility as required by 40 CFR 264.111, and in accordance with the closure plan, Attachment II.K.1 of the permit application.
2. The permittee shall maintain the facility in compliance with 40 CFR 264.601 during the required closure and post closure period.

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3. The permittee shall submit written notification to the Department at least 45 days prior to the date he expects to begin closure. [40 CFR 264.112(d)(1)]
4. The permittee shall submit a complete closure permit application to the Department at least 180 days prior to beginning closure. [62-730.260(1), FAC]
5. Within 90 days after generating the final volume of the hazardous waste that requires thermal treatment, the permittee shall treat the waste in accordance with the approved closure plan, Attachment II.K.1 of the Permit application. [40 CFR 264.113]
6. The permittee shall keep a copy of the closure plan and all revisions to the plan on-site (Attachment II.K of the Permit application), until closure is completed, certified, and the closure certification is accepted by the Department. [40 CFR 264.112(a)(1)]
7. The permittee shall amend the closure plan in accordance with 40 CFR 264.112(c) whenever necessary.
8. The permittee shall complete all closure activities listed in attachment II.K of the Permit application, within 180 days of treating the final volume of waste in the thermal treatment unit. In the event all contaminated soils and groundwater can not be removed within that time then the permittee shall submit a Permit application for post-closure care of the facility. [40 CFR 264.113].
9. The permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment II.K of the Permit application.
10. Within 60 days from completion of closure, the permittee shall submit to the Department by certified mail or hand delivery, a certification signed by both the permittee and an independent professional engineer registered in the State of Florida, stating that the facility has been closed in accordance with the Permit and specifications in the closure plan. [62-730.260(6), F.A.C. and 40 CFR 264.115]

Part VII Air Monitoring Requirements

1. The permittee shall keep records on quantities disposed of at the OBU and for the first 12 months report quarterly emission calculations for PM(10)*, CO, NOX, VOC, and Hazardous Air Pollutants (HAP's) to the Northwest District Air Program at the address shown in Part VIII.1.a of this permit.
2. Upon completion of the 12 month program in Condition 1, above, a review of the monitoring data shall be conducted and this permit modified to incorporate any changes deemed necessary in the air monitoring program.

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Part VIII General

1. Three copies of submittals in response to this Permit, except submittals required by Specific Condition 2 of this Part, shall be submitted as follows:
 - a. One copy shall be sent to:

Hazardous Waste Supervisor
Department of Environmental Protection
160 Governmental Center
Pensacola, Florida 32501-5794
 - b. One copy shall be sent to:

Environmental Administrator
Hazardous Waste Regulation Section
Bureau of Solid and Hazardous Waste
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
 - c. One copy shall be sent to:

Chief, Waste Management Division
US EPA - Region IV
100 Alabama Street, S.W.
Atlanta, Georgia 30303-3104
2. The permittee shall maintain compliance with 40 CFR 264 Subpart H-Financial Requirements until closure is completed and the closure certification is accepted by the Department. All submittals in response to this Specific Condition shall be submitted to:

Financial Coordinator
Hazardous Waste Section
Bureau of Solid and Hazardous Waste
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
3. All documents submitted pursuant to the conditions of this Permit shall be accompanied by a cover letter stating the name and date of the document submitted, the number(s) of the Specific Condition(s) affected, and the Permit number and project name of the Permit involved. All documents modifying the approved Closure and/or Post-Closure Plan submitted to the Department for review shall be signed, sealed, and certified by a

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Professional Engineer registered in the State of Florida, in accordance with Rule 62-730.220(7), F.A.C. and as required by General Condition 16.d of this permit.

4. All submittals modifying major engineering features of the hazardous waste storage areas shall be worded, signed, and certified by a qualified Professional Engineer registered in the State of Florida in accordance with Rule 62-730.220(7), F.A.C. All submittals incorporating interpretations of geological data shall be signed and sealed by a Professional Geologist registered in the State of Florida in accordance with Section 492, F.S., and Rule 62-730.220(8), F.A.C.
5. The permittee shall revise "Part I - General" of the Application for a Hazardous Waste Facility Permit (Rule 62-730.900(2), F.A.C.) within 30 days of any changes in the Part I. The revised "Part I - General" must be submitted to the Department within 30 days of such changes with the appropriate fees as specified in Chapter 62-4, F.A.C.
6. Before transferring ownership or operation of this facility during its operating life, the permittee must notify the new owner or operator in writing of the requirements of 40 CFR Part 264 and Rule 62-730.300(2), F.A.C. [40 CFR 264.12(c)]. The permittee shall also submit an application for transfer of the Permit on DEP Form 62-1.201(1), in accordance with Rule 62-730.300, F.A.C.
7. Based upon any information or data obtained after the effective date of this permit, the Department may modify this Permit to address additional groundwater assessment including the installation of additional wells within each affected aquifer. The new wells are subject to the installation requirements of 40 CFR Part 264.97.
8. The Department may modify, revoke, reissue, or terminate for cause, this Permit in accordance with the provisions of Rule 62-730.290, F.A.C. The filing of a request for a Permit modification, revocation, re-issuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any Permit condition. The permittee may submit any subsequent revisions to the Department for approval. These revisions shall meet the requirements of Rules 62-4.050 and 62-730.290, F.A.C., and must be accompanied by the appropriate Permit modification fees.
9. Prior to 180 days before the expiration of this permit, the permittee shall submit a complete application for renewal of the Permit to the Department, unless closure has been completed, certified in accordance with Specific Condition 10, Part VII of the permit, and accepted by the Department [62-730.300(1), FAC].

Executed in Pensacola, Florida

STATE OF FLORIDA DEPARTMENT

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OF ENVIRONMENTAL PROTECTION

Bobby A. Cooley
Director of District Management
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

OLIN CORPORATION

Fred L. Innes
Plant Director
St. Marks Operation

FILING and ACKNOWLEDGMENT FILED, on this date, pursuant to
Section 120.52, Florida Statutes, with the designated Clerk, receipt of
which is acknowledge.

CLERK

DATE

Notice of Permit was mailed before the

close of business on _____ 1996.

This is to certify that this

